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WHITFIELD'S DIRECT

April 11, 2003

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APR 11 2003

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**

Marlene H. Dortch, Esquire  
 Secretary  
 Federal Communications Commission  
 445 12th Street, S.W., Room TW-B204  
 Washington, D.C. 20554

Re: MM Docket No. 02-315  
 RM- IO566  
Moscow, Idaho

Dear Ms. Dortch:

Transmitted herewith, on behalf of State Board of Education, State of Idaho, licensee of noncommercial educational television station KUID-TV, and permittee of noncommercial educational digital television station KUID-DT, both Moscow, Idaho, are an original and four copies of its "Amendment to Petition for Rule Making" in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump  
 Counsel for State Board of Education,  
 State of Idaho

**Enclosures**

cc: Mr. James McLuckie (with enclosure) By E-Mail ([JMCLUCKI@FCC.GOV](mailto:JMCLUCKI@FCC.GOV))  
 Mr. John Morgan (with enclosure) By E-Mail ([JMORGAN@FCC.GOV](mailto:JMORGAN@FCC.GOV))

BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.606(b),	)	MM Docket No. 02-315
Table of Allotments,	)	RM-10566
Television Broadcast Stations, and	)	
Amendment of Section 73.622(b),	)	
Table of Allotments,	)	
Digital Television Broadcast Stations.	)	
(Moscow, Idaho)	)	

Directed to: Chief, Video Division

## **AMENDMENT TO PETITION FOR RULE MAKING**

State Board of Education, State of Idaho, which operates under the name of Idaho Public Television ("Idaho PTV"), and is licensee of noncommercial educational television station KUID-TV and permittee of noncommercial educational digital television station KUID-DT, both Moscow, Idaho, hereby respectfully submits its Amendment to its Petition for Rule Making in the instant proceeding, which proposes to amend Section 73.606(b) of its Rules, the Television Table of Allotments, to substitute Channel \*35 for Channel \*12 at Moscow, Idaho, and to amend Section 73.622(b) of its rules, the Digital Television ("DTV") Table of Allotments, to substitute Channel \*12 for Channel \*35, also at Moscow. With respect thereto, the following is stated:

1. This amendment is being submitted in response to the letter of the Associate Chief, Video Division, Media Bureau, dated March 14, 2003, Reference 1800E1-PB, which reported a Canadian objection to the channel changes proposed in the instant proceeding. The letter also

requested an amendment to the Idaho PTV Petition ~~For~~ Rule Making to eliminate the interference or to submit a Longley-Rice analysis that shows less than two percent interference. Accordingly, the Petition for Rule Making is hereby amended to submit such a Longley-Rice analysis.

2. Attached hereto is an Engineering Statement which provides such an analysis. **As** set forth therein, the result of the Longley-Rice analysis shows that no interference is predicted to the Canadian allotment in Canada. Furthermore, while some interference from the proposed DTV Channel 12 is predicted in three cells in the United States, two of those already receive interference from the existing NTSC Channel 12. Even more importantly, no population centroids are located in these three cells. Accordingly, it is clear that the channel modifications proposed in the instant proceeding would have no appreciable adverse effect on the operations of DTV Channel 12 at Oliver, British Columbia, and the Commission should adopt the modifications as proposed in this proceeding.

WHEREFORE, the preniiscs considered, Idaho PTV hereby respectfully requests that analog Channel \*35 be substituted for analog Channel \* 12- at Moscow and that the license for KUID-TV be modified accordingly. and further request that DTV Channel \* 12- be substituted for DTV Channel \*35 at Moscou and that the construction permit for KUID-DT be modified accordingly.

Respectfully submitted,

STATE BOARD OF EDUCATION,  
STATE OF IDAHO

By:

  
Anne Goodwin Crump

Its Attorney

FLETCHER, HEALD & HILDRETH, P.L.C  
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April 11, 2003

ENGINEERING STATEMENT  
ON BEHALF OF  
THE STATE BOARD OF EDUCATION, STATE OF IDAHO  
**KUID-TV AND KUID-DT, MOSCOW, IDAHO**  
IN RESPONSE TO  
FCC LETTER DATED MARCH 14, 2003

APRIL 2003

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

### Introduction

This engineering statement has been prepared on behalf of State Board of Education, State of Idaho, licensee of KUID-TV, Moscow, Idaho. KUID-TV is currently assigned NTSC Channel 12 and DTV Channel 35 in the respective allotment tables. The licensee is petitioning to interchange its DTV and NTSC channels. Specifically this engineering statement is in response to the FCC letter dated March 14, 2003. The response is based on Section 7 of the *Letter of Understanding* with reference to the provision of using Longley-Rice model when contour overlap is possible.

The results of the Longley-Rice analysis is provided

### Longley-Rice Analysis

This office's software performed the analysis of the absence of predicted interference caused by the proposed Channel 12 LIT allotment for Oliver, BC. The analysis has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of

calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km<sup>2</sup> using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids. With reference to Canadian station for DTV Ch. 12 at Oliver, British Columbia, all studies are based upon data in the *Letter of Understanding*.

The following table summarizes the area and population encompassed by the two service contours on Exhibit 1

	<u>45 km Radius</u>	Noise-Limited <u>Contour</u>
<b>Total Area</b>	<b>6,360 sq. km</b>	<b>6,680 sq. km</b>
(in Canada)	(4,930 sq. km)	(4,260 sq. km)
(in U.S.)	(1,430 sq. km)	(2,420 sq. km)
<b>Total Population</b>	<b>62,500</b>	<b>89,500</b>
(in Canada 1996 data)	(57,100)	(79,900)
(in U.S. 2000 data)	(5,400)	(9,600)
(in U.S. 1990 data)	(4,700)	(8,200)

Exhibit 1 shows the Longley-Rice coverage and the resulting interference using the Longley-Rice methodology. No interference is predicted to the Canadian allotment in Canada. The existing NTSC Ch. 12 causes interference to two cells (8 sq. km) in the United States. The proposed DTV Ch. 12 causes one additional cell (4 sq. km) of interference. No population centroids are located in these three cells.

No interference to the proposed Canadian, Ch. 12 allotment at Oliver, BC, is predicted within the 45 km radius service area

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

CH. 12 DTV ALLOT.  
33 dBu F(90,90)

CH. 12 DTV ALLOT. 45 KM RADIUS

CANADA  
UNITED STATES

EXHIBIT 1  
MAP SHOWING  
33 dBu F(90,90) CONTOUR AND  
LONGLEY RICE SERVICE FOR  
CH. 12 DTV ALLOTMENT CLASS B AT  
**OLIVER, BC**  
IN RELATION TO  
LONGLEY RICE ANALYSIS  
FROM THE PROPOSED OPERATION OF  
**KUID-DT, MOSCOW, ID**  
CHANNEL 12 128.5 KW 340 METERS  
APRIL 2003

MAP KEY

- 45 KM RADIUS
- NOISE LIMITED SERVICE AREA
- DTV IX
- NTSC IX
- ALLOT. SITE
- 0 10 20 30
- Kilometers

MAP SOURCE: TIGER/Line CENSUS FILES 2000